USUC SDNY Case 1:12-cy-02854-NRB Document 9 Filed 05/29/12 Page 1 of 2 DOCUMENT THE STONICALLY FILEDMEMOEN

Craig Carson 95 Wyndshire Lane Rochester, N.Y. 14626

May 21, 2012

RECEIVED IN CHAMBERS
OF NAOMI REICE BUCHWALD MAY 21 2012 **UNITED STATES COURT JUDGE**

Judge Buchwald,

I would like to request an adjournment. Currently, I am the attorney for the Plaintiff, Charlotte Thomas in Charlotte Thomas vs. Coach USA Tour Inc. and Twin America (12 CIV. 2854-NRB). However, as noted in the Notice of Initial Pretrial Conference this conference must be attended by the principal trial counsel. I have not been given authority to act as principal trial counsel, to settle the case or make other stipulations. These responsibilities will be handled by Terrance Cain, who will serve as principal trial counsel.

Mr. Cain is an Assistant Professor of Law at William H. Bowen School of Law in Little Rock, Arkansas. For this very reason, Mr. Cain is currently occupied with grading law school exams from the spring semester. Additionally, Mr. Cain has not yet been admitted Pro Hac Vice to the Southern District of New York. Furthermore, Mr. Cain's son's high school graduation willtake place on May 24th, 2012.

However, subsequent months will provide more open calendar days to attend to the pretrail conference. In June, Mr. Cain will be available the following dates:

- 1. June 5th- June 8th-throughout the day.
- 2. June 15th-throughout the day.
- 3. June 19th-June 22nd-throughout the day.
- 4. June 25th-June 29th-throughout the day.

In July, Mr. Cain will be available the following dates:

- 1. July 6th throughout the day.
- 2. July 12th & July 13th throughout the day.
- 3. July 16th throughout the day.

In August, Mr. Cain will be available the following dates:

- 1. August 1st-August 3rd throughout the day.
- 2. August 8th August 10th throughout the day.
- 3. August 15th- August 17th throughout the day.

I spoke with opposing counsel, Heather Ragone Esq., she is in agreement with our request for an adjournment. This conversation took place in the early afternoon on May 16, 2012. Case 12 Civ. 2854 (NRB)

Submitted: May 21, 2012

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Thanks for considering the pertinent details of the aforementioned matter.

Respectfully submitted.

Craig Carson

Attorney for Plaintiff

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